



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
NEW YORK REGIONAL OFFICE  
BROOKFIELD PLACE  
200 VESEY STREET, ROOM 400  
NEW YORK, NY 10281-1022

February 7, 2020

By ECF

Hon. P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: SEC v. Telegram Group Inc. & TON Issuer Inc., No. 19 Civ. 9439 (PKC)

Dear Judge Castel:

Plaintiff Securities and Exchange Commission (the "SEC") respectfully submits this letter in connection with motions by Defendants Telegram Group Inc. and TON Issuer Inc. (collectively "Telegram") and various third party investors to seal or redact portions of exhibits that have been submitted in connection with the parties' pending motions. These motions to seal or redact were filed on February 4, 2020 (except for one investor, who filed its motion on January 22, 2020).<sup>1</sup>

The SEC respectfully requests permission to file one omnibus response to these various motions and to do so by no later than Wednesday, February 12, 2020. Counsel for Telegram consents to this application.

Respectfully submitted,

/s/ Kevin P. McGrath  
Kevin P. McGrath

cc: Alexander Drylewski, Esq.  
Counsel for Defendants

---

<sup>1</sup> In its Order dated January 22, 2020, Dkt. 108, the Court granted the SEC's application on consent to give all third parties until February 4, 2020 - after all scheduled briefing was completed and all documents relied upon in connection with that briefing had been identified - to file any motions to seal or redact such documents.